

EXHIBIT

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**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
INC., *et al.*,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, *et al.*,

Defendants.

Civil Action No. 4:18-cv-00554-DCC

DECLARATION OF RAIMYIA WHEELER

I, Raimyia Wheeler, hereby state as follows:

1. I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth herein.

2. I am African American. I live in Wilmington, Delaware.

3. I first attended Black Bike Week in 2000 and with the exception of a few years, I have attended each year since then.

4. I usually come to the Myrtle Beach area the Saturday or Sunday of Harley Week and stay throughout Black Bike Week. I travel with friends and family and usually rent a condo or a house in Barefoot Landing in between Myrtle Beach and Atlantic Beach.

5. Since 2015, I've noticed that the traffic during Black Bike Week has gotten worse due to the restrictive traffic plan that Myrtle Beach implements.

6. In 2017, I was in the Myrtle Beach area from May 20 to May 29.

7. During Saturday and Sunday of Harley Week and throughout the weekdays of Black Bike week, there were no traffic restrictions on Ocean Boulevard. I was able to ride my bike freely in Myrtle Beach.

8. On Friday night of Black Bike Week, I left my condo at 9:40 pm to travel to my friend's house in Myrtle Beach. I rode my bike from Barefoot landing to US 17 Bypass to get to Ocean Boulevard. I found that the loop had already started.

9. This trip is a few miles and during the week, it takes me 15 minutes, however because of the traffic loop the trip took me more than 2 hours. The traffic was very slow moving as Ocean Boulevard was restricted to one lane. During the trip, I was afraid that my bike would overheat and shut down so I had to keep turning my bike off. Riding my bike in stand-still traffic for so long gave me swollen hands and pain in my wrists.

10. On Saturday night of Black Bike Week, I wanted to meet some friends in Myrtle Beach. The traffic was very slow and I got stuck in the loop again for 2 hours. It is extremely frustrating to be in unnecessary traffic for so long.

11. I noticed a large police presence in Myrtle Beach during Black Bike Week. This was not the case during Harley Week. I spoke to a police officer on Saturday night of Black Bike Week in 2017 who had travelled from out of town to work in Myrtle Beach. He told me that there were hundreds of officers who travelled to Myrtle Beach for Black Bike Week to help with 'crowd control'. This makes me upset because it seems like there is a different standard for African American bikers.

12. I have noticed crowds at Harley Week behaving in an unruly manner. I've seen people attempting to do 'burnouts' (keeping a bike stationary while spinning the wheels causing the tires to create smoke), people congregating in parking lots and tailgating. To me, the crowd

size during Harley Week is very similar to the crowd size at Black Week. Yet the policing during Black Bike Week is much more aggressive than during Harley Week.

13. I believe that the City of Myrtle Beach is treating African American bikers differently than white bikers and tourists by implementing the restrictive traffic plan and deploying excessive police presence during Black Bike Week. This upsets me and makes me feel like the City does not care about African American tourists.

14. After my experiences at Black Bike Week, I was frustrated at the discrimination against African Americans. I heard about the lawsuit against the City of Myrtle Beach and I decided to contact the NAACP to file a Complaint.

15. Although I love attending Black Bike Week, I will not be visiting Myrtle Beach this year because of the City's discriminatory treatment towards Black Bike Week attendees.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED WITHIN THE UNITED STATES ON: April 8, 2018.

BY:


Raimyia Wheeler